

MM 99-25 ORIGINAL

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Congress of the United States

August 25, 1999

House of Representatives

Washington, DC 20515

Federal Communications Commission
Attn. Legislative Affairs Division
1919 M Street, NW
Washington, D.C. 20554

RECEIVED

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MMB
LP Radio
#4742

AUG 30 1999

FCC Legislative Affairs:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Enclosed you will find a copy of a message sent to me by Dr. Kenneth Bowles concerning Notice of Proposed Rule Making, 99-25.

I would appreciate you looking into this situation. I have informed my constituent that they can expect to hear from you directly on this matter. Finally, please forward a copy of your response to my office.

Thank you for your prompt assistance in this matter.

Sincerely,

Kenny Hulshof
Member of Congress

KH:emv

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Date & Time: 7/22/99 11:40:41 AM
Pages: 4
Re: FCC NPRM #99-25, Low Power FM Radio Service

The FAX contains a request from Dr. Bowles to support the implementation by the FCC of the LP1000 portion of its NPRM #99-25, Low Power FM Radio Service.

**SUBJECT: FCC'S NOTICE OF PROPOSED RULE MAKING 99-25, LOW POWER FM
RADIO SERVICE, A PARTIAL ENDORSEMENT OF THE PROPOSAL**

Dear Representative Hulshof,

For seventeen years I have been in radio station management in Missouri. For the last twelve years I have been a Christian broadcaster in East Central Missouri. I am a member of National Religious Broadcasters, the Society of Broadcast Engineers, and the Gospel Music Association.

Early this year the Federal Communications Commission (FCC) released a Notice of Proposed Rule Making (NPRM), 99-25, concerning a proposed, new Low Power FM (LPFM) Radio Service. The notice proposes the creation of regulations which would allow additional radio stations in the FM broadcast band. I do not endorse portions of the notice which would create LP100 (one hundred watt radio stations) and microradio stations (10 watt stations). However, I do endorse the portion of the notice which allows new LP1000 (1,000 watt) radio stations.

Though the principle of deregulation is basically sound, it has had one bad effect. It is destroying local ownership of radio stations. In the St. Louis market, all the major stations are probably owned by four organizations, usually with out of state corporate offices.

For Christian broadcasting, it has resulted in a reduction of critical stations and an increase of stations owned by non-local owners. For example, take the case of WCBW-FM. WCBW was a locally owned Christian music station with a national reputation of excellence. The effect of deregulation was a drastic increase in the value of the station and its sale to an out of state owner who removed the Christian Contemporary music format. The station is impossible to replace even if money were no object because no owner wants to sell his station and because the present FCC regulations prohibit the construction of new stations which will cover the St. Louis market.

The FCC's proposal would allow the construction of Low Power FM stations in the St. Louis market (as well as at several other locations in Missouri). One LP1000 station could cover around one million persons in the core area of St. Louis. It could partially make up for the loss of WCBW-FM.

The proposed rules would require that LP1000 stations be technically on a par with current stations. The major differences are that current broadcasters could not be licensees of LPFM stations (resulting in local ownership) and that third adjacent interference protection would be removed (resulting in additional channels). I do not endorse at this time the FCC's optional proposal of the removal of second adjacent channel protection because it is not yet certain that the removal would not impede the future conversion to digital broadcasting.

Currently most FM radio stations cause the reservation of seven channels (the center channel plus three adjacent channels on each side of the center channel). The adjacent channels are reserved to stop interference between stations. However the potential of interference in the third adjacent channel is negligible for low power stations. We know this is true because:

1. The NPRM indicates that FCC engineers have found this to be true.
2. There are already 460 existing FM radio stations which do not have third adjacent channel protection. These stations normally would be much more powerful stations than LPFM stations. The NPRM indicates the FCC has not received one single report of interference because of the lack of the third channel protection.
3. A simple experiment can be performed by you or your staff which will reveal the absence of interference in the third adjacent channel. The experiment involves locating the transmitting site of an existing station using low power (perhaps 1,000 to 3,000 watts), driving to the location, and tuning your radio to the third adjacent channels and comparing what you hear to what is being broadcast on the center channel. You will not hear any interference from the station on the center channel. To hear interference you would normally have to climb the tower!

I have attached a map to this e-mail which locates the WMMJ-FM 102.3 antenna site in Washington, DC. The two third adjacent channels are 102.9 and 101.7. WMMJ runs 2,900 watts (almost three times as much as a LP1000 station) and has its antenna pointing south at 146 meters above average terrain (more than twice as high as a LP1000 station). If you have any question about interference related to LPFM stations, drive by WMMJ!

I urge you to do everything possible to assure that the FCC issues rules to create the LP1000 portion of the NPRM. This could bring more Christian radio to Missouri and create more Missouri owners of the state's own radio stations.

Please furnish a copy of this e-mail to the person who advises you on telecom issues.

Thank you for your consideration!

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Concerning the following map, the location of WMMJ is at the star.

